

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JANE DOE 1, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

JP MORGAN CHASE BANK, N.A.,

Defendant.

Case No. 22-cv-10019 (JSR)

**JPMORGAN CHASE BANK, N.A.'S NOTICE OF MOTION TO EXCLUDE
PLAINTIFF'S EXPERT**

Pursuant to Federal Rule of Evidence 702 and *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509 U.S. 579 (1993), Defendant JPMorgan Chase Bank, N.A., hereby respectfully requests that the Court exclude the Expert Report and Reply Expert Report of Jane Khodarkovsky, submitted by Plaintiff Jane Doe in support of her motion for class certification. The reasons in support of Defendant's Motion are set forth in the attached Memorandum of Law.

Dated: May 12, 2023

Respectfully submitted,

**WILMER CUTLER PICKERING
HALE AND DORR LLP**

/s/ Felicia Ellsworth

Felicia H. Ellsworth

John J. Butts

60 State Street

Boston, MA 02109

(t) (617) 526-6000

(f) (617) 526-5000

felicia.ellsworth@wilmerhale.com

john.butts@wilmerhale.com

Boyd M. Johnson III
Robert L. Boone
Hillary Chutter-Ames
7 World Trade Center
250 Greenwich Street
New York, NY 10007
(t) (212) 230-8800
(f) (212) 230-8888
boyd.johnson@wilmerhale.com
robert.boone@wilmerhale.com
hillary.chutter-ames@wilmerhale.com

Attorneys for JPMorgan Chase Bank, N.A.